

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 24-CV-380

C.M., *a minor*, through his parents,
LEAH McGHEE and CHAD
McGHEE,
Plaintiff,
v.
DAVIDSON COUNTY SCHOOL
DISTRICT BOARD OF
EDUCATION; *and* ERIC R.
ANDERSON, in his individual
capacity,

**PLAINTIFF'S UNOPPOSED MOTION
FOR EXTENSION OF TIME FOR ALL
PENDING CASE DEADLINES**

Defendants

Plaintiff C.M., by and through undersigned counsel, hereby requests on behalf of all parties a short extension of time to (1) file Plaintiff's Reply in Support of Preliminary Injunction ("Reply"); (2) meet and confer regarding the redaction of documents; and (3) file Defendants' Amended Opposition to Plaintiff's Injunction. This request is being made only because the Parties believe they are likely close to reaching an agreement in principle to resolve this matter.

In support of this motion, Plaintiff states the following:

1. Plaintiff filed his Motion for Preliminary Injunction (“PI Motion”) on June 4, 2024.

2. Defendants' Response in Opposition to Motion for Preliminary Injunction ("PI Opposition") and supporting documents (filed June 28, 2024) contain redacted information.

3. Plaintiff was unable to adequately respond to Defendants' Response in the absence of an unredacted version of the PI Opposition and its supporting exhibits.

4. Plaintiff moved, and Defendant did not object, for an extension of the deadline for Plaintiff to file his Reply until 7 days after receipt of unredacted copies of Defendants' PI Opposition. *See* Dkt. 27, Dkt. 28.

5. The Court granted this motion. Dkt. 29.

6. On January 6, 2025, this Court ordered Defendants to produce unredacted copies of the PI Opposition and supporting exhibits by January 20, 2025, to meet and confer regarding the redaction of documents by February 5, 2025, and for Defendants' counsel to file unredacted documents by February 10, 2025.

7. On February 6, 2025, this Court granted Plaintiff's unopposed motion to extend time to file its reply brief to February 7, 2025.

8. On February 7, 2025, this Court granted Plaintiff's unopposed motion to extend all pending case deadlines.

9. The motion referenced in Paragraph 8 was filed based on the Parties' substantial progress in negotiating a potential settlement of this matter. Such negotiations are ongoing. The Parties now believe a settlement in principle may be imminent, but they require a little more time to get the consent of all their clients. Accordingly, the Parties

believe it is in their interest and the interest of judicial economy to seek an additional extension of all existing deadlines.

10. This motion is filed in good faith for the reasons stated, and not for purposes of delay.

WHEREFORE, the Parties jointly request that the Court enter an order extending: (1) Plaintiff's deadline to file his Reply through February 25, 2025; (2) extending the Parties' deadline to meet and confer to determine whether or to what extent Plaintiff will consent to the public filing of information related to the minor Plaintiff but currently redacted in the public filings through February 26, 2025; and (3) extending Defendants' deadline to file an Amended Opposition to Plaintiff's Injunction to March 28, with the only change being a removal of any redactions to which Plaintiff's guardians, through counsel, have consented to disclose and have waived any protections of that information from disclosure under FERPA.

February 21, 2025

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